

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

REV. PEARCE EWING,

*On Behalf of Himself and All Others
Similarly Situated,*

Plaintiff,

v.

Civil Action No. 2:22-cv-02136-JTF-atc

NEWPORT GROUP, INC., SYMETRA
FINANCIAL CORPORATION, REV. DR.
JEROME V. HARRIS, AFRICAN
METHODIST EPISCOPAL CHURCH,
AND JOHN DOES 1-10,

Defendants.

**DEFENDANT AFRICAN METHODIST EPISCOPAL CHURCH’S UNOPPOSED
MOTION FOR EXTENSION OF TIME TO RESPOND TO THE COMPLAINT**

Defendant African Methodist Episcopal Church (“AMEC”) respectfully moves the Court to extend the deadline for AMEC to respond to the Complaint through June 27, 2022. Plaintiff does not oppose this motion. In support of this Motion, AMEC states the following:

1. Four additional class action complaints have been filed involving the AMEC Fund—*Jackson v. Newport Group, Inc., et al.*, Case No. 2:22-cv-02174 (W.D. Tenn.); *Wade v. African Methodist Episcopal Church, et al.*, Case No. 3:22-cv-00179 (E.D. Va.); *Russ v. Newport Group, Inc., et al.*, Case No. 3:22-cv-00375 (M.D. Fla.); and *Alexander v. Harris, et al.*, Case No. 8:22-cv-00707 (D. Md.) (collectively, the “Related Class Actions”).

2. This action and the Related Class Actions are currently the subject of a Motion for Transfer of Actions filed under 28 U.S.C. § 1407 before the Judicial Panel on Multidistrict Litigation

(“JPML”) seeking coordinated or consolidated proceedings (the “MDL proceeding”). (*See In re: AME Church Employee Retirement Fund Litigation*, MDL No. 3035, ECF No. 1.) The Motion to Transfer is currently pending.

3. Because the Related Class Actions and the MDL proceeding involve complex matters, AMEC needs additional time to respond, which may ultimately be impacted by resolution of the MDL Motion to Transfer.

4. Further, Co-Defendants Harris, Newport, and Symetra have a current deadline of June 27, 2022 to respond to the Complaint in this matter. (ECF Nos 45, 46, and 49, respectively.) Extending AMECs deadline to June 27, 2022 will serve the purpose of giving the Defendants in this matter a consistent, stream-lined response deadline.

5. Counsel for AMEC conferred with Plaintiff’s counsel on May 19, 2022, and Plaintiff does not oppose the requested relief.

For these reasons, AMEC respectfully requests that the Court enter an order granting an extension through June 27, 2022 for AMEC to respond to the Complaint.

Respectfully submitted,

BAKER, DONELSON, BEARMAN
CALDWELL & BERKOWITZ, PC

/s Bruce A. McMullen

Bruce A. McMullen (TN #18126)
165 Madison Avenue, Suite 2000
Memphis, Tennessee 38103
Telephone: 901.526.2000
Fax: 901.577.2303
bmcullen@bakedonelson.com

CERTIFICATE OF CONSULTATION

Under Local Rule 7.2, AMEC's counsel contacted Plaintiff's counsel on May 19, 2022 about this requested relief. Plaintiff's counsel represented that Plaintiff does not oppose this Motion.

/s Bruce A. McMullen

CERTIFICATE OF SERVICE

I hereby certify that on this day, May 19, 2022, a copy of the attached Motion was filed electronically. Notice of this filing will be served by operation of the Court's electronic filing system to all counsel of record.

/s Bruce A. McMullen